

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)
)
Advanced Television Systems)
and Their Impact upon the) MB Docket No. 87-268
Existing Television Broadcast Service)

To: Office of the Secretary

COMMENTS OF SMITH MEDIA LICENSE HOLDINGS, LLC

Smith Media License Holdings, LLC (“Smith”), by its counsel, hereby submits these late-filed comments in the above-referenced proceeding.¹ Smith requests change of certified facilities for KJUD-DT, Juneau, Alaska (the “Station”) and proposes revision of the allotment set forth in the *FNPRM*. Pursuant to these comments, the DTV Table of Allotments in relevant portion would be changed as set forth in the *FNPRM*:

| Facility ID | State and City | | NTSC | DTV | | | | | |
|-------------|----------------|--------|------|-----|--------|----------|------------|-------------------|--------------------|
| | | | Ch | Ch | ERP kW | HAAT (m) | Antenna ID | Latitude (DDMMSS) | Longitude (DDMMSS) |
| 13814 | AK | JUNEAU | 8 | 11 | 3 | 33 | 74796 | 581806 | 1342629 |

To:

| | | | | | | | | | |
|-------|----|--------|---|----|-------------|----|--|---------------|----------------|
| 13814 | AK | JUNEAU | 8 | 11 | <u>0.14</u> | 33 | | <u>581805</u> | <u>1342626</u> |
|-------|----|--------|---|----|-------------|----|--|---------------|----------------|

This instant filing is occasioned by Smith’s submission today of a DTV construction permit application for the Station.² Smith intends to operate these digital facilities as constructed once analog service terminates. In the DTV construction permit application, Smith proposes to employ a more efficient DTV antenna system that would reduce signal coverage over

¹ Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service, MB Docket No. 87-268, *Seventh Further Notice of Proposed Rule Making*, FCC 06-150 (rel. Oct. 20, 2006) (“*FNPRM*”).

² See BMPCDT-20070412AAI.

uninhabited areas. The proposed DTV service area population of 29,991 persons is almost twice the authorized NTSC Grade B service area population of 16,671, but the Station still only would reach 97.5% of the 30,759 persons in the “certified” service area corresponding to the proposed allotment set forth in the *FNPRM*. Given the benefit of operating with a more efficient antenna system and of nearly doubling the Station’s NTSC service area population, and given that the “shortfall” only is theoretical in that the small number of “affected” persons are not now receiving either the analog or digital signal of KJUD, Smith believes it is in the public interest for the Commission to revise the allotment such that it would conform with the actual facilities. Furthermore, Smith believes that grant of this proposal would allow the Commission to avoid re-visiting this matter at a later date. To the extent necessary, waiver hereby is requested.

No party would be prejudiced by acceptance of this proposal. This proposal satisfies the requirement in the *FNPRM* that any modification to the proposed Table not cause interference in excess of 0.1 percent to any tentative channel designation. Indeed, the proposal is not predicted to cause any interference whatsoever.

For these reasons, Smith respectfully requests that the Commission change the Station’s certified facilities and allotment in the *FNPRM* as specified.

Respectfully submitted,

SMITH MEDIA LICENSE HOLDINGS, LLC

/s/

By _____
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April 12, 2007